

PHILLIPS NIZER LLP  
Sandra A. Riemer (SAR 2871)  
Candice Frost (CF 3926)  
Attorneys for Freescale Semiconductor, Inc.,  
f/k/a Motorola Semiconductor Systems (U.S.A.) Inc.  
666 Fifth Avenue  
New York, New York 10103-0084  
(212) 977-9700

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	: Chapter 11
	:
DELPHI CORPORATION, <u>et al.</u> ,	: Case No. 05-44481
	:
Debtors.	: (Jointly Administered)
	:
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**MOTION FOR ADMISSION TO  
APPEAR PRO HAC VICE**

To The Honorable Robert D. Drain,  
United States Bankruptcy Judge:

SANDRA A. RIEMER, a member of, inter alia, the Bar of the State  
New York and admitted to practice before this Court, moves this Honorable  
Court to admit Susan M. Freeman to appear *pro hac vice* to represent Freescale  
Semiconductor, Inc., f/k/a Motorola Semiconductor Systems (U.S.A.) Inc.,  
("Freescale"), a party-in-interest, pursuant to L.B.R. 2090-1(b) (S.D.N.Y.), in the  
above-captioned case; and respectfully states as follows:

1. Susan M. Freeman, a partner at the law firm of Lewis and  
Roca LLP, is and has been a member in good standing of the State Bar of

Arizona since 1975 and is also admitted to practice before the United States District Court for the District of Arizona, the United States District Court for the Northern District of Texas, the United States District Court for the District of Colorado, the United States Court of Appeals for the Ninth Circuit, the United States Court of Appeals for the Tenth Circuit, the United States Court of Appeals for the Fifth Circuit and the United States Supreme Court. Ms. Freeman's address is Lewis and Roca LLP, 40 North Central Avenue, Suite 1900, Phoenix, Arizona 85004-4429; her e-mail address is [sfreeman@lrlaw.com](mailto:sfreeman@lrlaw.com); her telephone number is (602) 262-5756.

2. Ms. Freeman agrees to pay the fee of \$25.00 upon entry of an Order admitting her to practice before this Court *pro hac vice*.

WHEREFORE, this Court is respectfully requested to admit Susan M. Freeman to appear *pro hac vice* to represent Freescale in the above-captioned case.

Dated: New York, New York  
October 11, 2005

Respectfully submitted,

PHILLIPS NIZER LLP

By: 

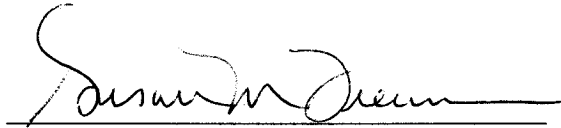
Sandra A. Riemer (SAR 2871)  
A Member of the Firm

666 Fifth Avenue  
New York, NY 10103  
(212) 977-9700

**VERIFICATION**

SUSAN M. FREEMAN declares, under penalty of perjury, that she has read the foregoing Motion and that the facts contained therein are, to the best of her knowledge, information and belief, true and correct.

Executed on October 11, 2005

A handwritten signature in cursive script, appearing to read "Susan M. Freeman", is written over a horizontal line.

Susan M. Freeman

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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DELPHI CORPORATION, <u>et al.</u> ,	: Case No. 05-44481
	:
Debtors.	: (Jointly Administered)
	:
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**ORDER OF ADMISSION TO  
APPEAR PRO HAC VICE**

Susan M. Freeman, having represented that she is a member in good standing of the bar of the State of Arizona and is also admitted to practice before the United States District Courts for the District of Arizona, the Northern District of Texas, and the District of Colorado, the United States Courts of Appeals for the Fifth, Ninth, and Tenth Circuits, and in the United States Supreme Court, and having requested admission, *pro hac vice*, to represent Freescale Semiconductor, Inc., f/k/a Motorola Semiconductor Systems (U.S.A.) Inc, a party in interest in the above-captioned case; it is hereby

ORDERED, that Susan M. Freeman, Esq., is admitted to appear  
*pro hac vice* in the above-captioned case in the United States Bankruptcy Court  
for the Southern District of New York, subject to payment of the filing fee.

Dated: New York, New York  
October \_\_, 2005

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UNITED STATES BANKRUPTCY JUDGE